

1 JASON M. FRIERSON

United States Attorney

2 District of Nevada

Nevada Bar No. 7709

3 TROY K. FLAKE

Assistant United States Attorney

4 501 Las Vegas Blvd. So., Suite 1100

Las Vegas, Nevada 89101

5 (702) 388-6336

Troy.Flake@usdoj.gov

6 *Attorneys for the United States*

7  
8 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

9 ABC Recycling Industries, LLC,

10 Plaintiff,

11 v.

12 United States of America, Does I through  
13 X, Inclusive,

14 Defendant.

Case No. 2:22-cv-01278-ART-BNW

**Stipulation to Extend United States'  
Deadline to Answer  
(Second Request)**

15 Pursuant to Local Rule IA 6-1, the parties stipulate and request that Defendant  
16 United States of America shall have a an additional 30-day extension of time to file an  
17 answer or otherwise respond to Plaintiff's Complaint. (ECF No. 1). This is the parties'  
18 second request. The current deadline to answer or otherwise respond is November 21,  
19 2022. The parties request that the new deadline be December 21, 2022.

20 The Parties are working diligently to determine whether this matter can be resolved  
21 or deferred through alternative forms of resolution with the relevant government agencies.  
22 The parties agree that a 30-day extension is appropriate under the circumstances. This  
23 stipulation is filed in good faith and not for the purpose of delay.  
24

Respectfully submitted this 17th day of November, 2022.

/s/ Karen L. Hanks  
KAREN L. HANKS, ESQ.  
*Attorney for Plaintiff ABC Recycling*

**IT IS SO ORDERED:**

UNITED STATES MAGISTRATE JUDGE

**DATED:** November 18, 2022